

From: [Michael PINTO](#)
To: [Bury, Carolyn](#)
Cc: [Bob WRIGHT](#)
Subject: East Palnt Bi-Monthly Report
Date: Friday, November 15, 2013 3:47:45 PM
Attachments: [September October 2013.pdf](#)

Carolyn,

Attached please find the Bi-Monthly Progress Report for the Arkema East Plant in Wyandotte, Michigan. The attached report covers the September/October 2013 reporting period. The November December report will reflect that LSS, BASF, and Union Carbide have signed a project agreement with GLNPO to perform the Trenton Channel RD. We just signed today.

Michael Pinto
RETIA USA LLC/Legacy Site Services LLC
468 Thomas Jones Way, Suite 150
Exton, PA 19341
Office: 610 594-4435
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November 15, 2013

via overnight courier

United States Environmental Protection Agency
Region V
RCRA Enforcement Branch (HRE-8J)
77 Jackson Street
Chicago, IL 60604
Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order
Docket No. V-W-89R-45
Arkema Inc.
Riverview, Michigan
MID 005 363114
Progress Report #142

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of September and October 2013. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for September and October 2013 is also included.

I. East Plant Activities Completed in September and October

CMS Task IV

The CMS is currently under review by USEPA.

Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. Since pumping began in 2001, 1,184,580 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 495 gallons of DNAPL have been recovered and properly disposed. A total of 25,920 gallons of groundwater were extracted and treated during the reporting period.

Other Activities

LSS, on behalf of Arkema, is participating in a Great Lakes Legacy Act project to complete an RI/FS in the Trenton Channel. Work on this project is ongoing. The Focused Feasibility Study was finalized during the reporting period. It is expected that in 2013 LSS, GLNPO, and other non-federal parties will execute a GLLA Project Agreement to prepare a remedial design.

II. Corrective Action Activities Anticipated for November and December 2013

CMS Task IV

LSS will await EPA approval and/or comments on the CMS.

Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue.

Other Activities

A GLLA Project Agreement to complete a remedial design for the Trenton Channel will be signed by LSS and other non-federal sponsors.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,



Michael Pinto
Principal Environmental Engineer

Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing
Mr. Laura Verona- MDNR - Waste Management Div. Livonia